



**U.S. Department of Justice
Office of the United States Trustee**

*Northern District of New York (Albany Division),
Southern District of New York (Poughkeepsie Division),
and District of Vermont*

Leo O'Brien Federal Building
11A Clinton Ave., Room 620
Albany, NY 12207
(518) 434-4553

VIA ECF ONLY

May 5, 2025

Hon. Robert E. Littlefield, Jr.
United States Bankruptcy Judge
James T. Foley Federal Courthouse
445 Broadway
Albany, NY 12207

Re: Kris Daniel Roglieri
Chapter 7 Case No.: 24-10157

Dear Judge Littlefield:

On February 3, 2025, the debtor, Kris Daniel Roglieri, filed a Motion to Remove Chapter 7 Trustee Christian Dribusch ("Motion to Remove") pursuant to 11 U.S.C. § 324(a). Since that time, the debtor has filed at least 12 additional documents "in support" of the Motion to Remove. Certain of the debtor's filed documents purport to be replies to objections and other documents filed by other parties to the matter.

As the Court is aware, and as previously noted in documents filed by the United States Trustee in this matter, the Local Bankruptcy Rules for the Northern District of New York do not authorize parties to file replies. Rather, parties must seek and obtain an order of the Court to allow the filing of replies.

In this case, despite having filed numerous "replies," the debtor has never sought nor obtained an order of this Court allowing him to file said documents. Because the debtor is *pro se*, the United States Trustee has refrained from seeking relief from the debtor's relentless stream of

unauthorized filings “in support” of his Motion to Remove over the past three months. The time has come, however, to request the Court’s intervention with respect to same.

On April 4, 2025, after having granted the debtor several extensions of time, the Court entered a text order allowing the debtor until April 7, 2025 to file, “missing documents pertaining to the removal motion (ECF No. 345).” To facilitate the trustee’s right to procure official transcripts of certain hearings conducted in this case, the Court gave Mr. Dribusch until April 28, 2025 to file his response to the removal motion. (ECF 434).

On April 17, 2025 and April 18, 2025, respectively, the United States Trustee and the chapter 7 trustee each filed their final objections to the Motion to Remove. (ECF 445, 448). Upon information and belief, the record on the Motion to Remove was closed as of April 18, 2025 and the Court placed the matter on its reserve list.

On May 2, 2025, the debtor filed yet another unauthorized reply. (ECF 466). In the interests of bringing the Motion to Remove to finality and in light of the extraordinary lenience the Court has shown the debtor to this point in time, the United States Trustee respectfully requests the Court strike the debtor’s May 2, 2025 filing (ECF 466) *with prejudice* and prohibit the debtor from filing any additional documents “in support” of the Motion to Remove.

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE, REGION 2

By: /s/ Lisa M. Penpraze
Assistant United States Trustee
Leo O’Brien Federal Building
11A Clinton Ave., Room 620
Albany, NY 12207
Bar Roll No.: 105165
lisa.penpraze@usdoj.gov
(518) 434-4553